

1 PHILLIP A. TALBERT
2 United States Attorney
3 MATHEW W. PILE
4 Associate General Counsel
5 Office of Program Litigation, Office 7
6 CASPAR CHAN, CSBN 294804
7 Special Assistant United States Attorney
8 Social Security Administration
9 6401 Security Boulevard
10 Baltimore, MD 21235
11 Telephone: 510-970-4810
12 Facsimile: 415-744-0134
13 Email: Caspar.Chan@ssa.gov
14 Attorneys for Defendant

15 **UNITED STATES DISTRICT COURT**
16 **EASTERN DISTRICT OF CALIFORNIA**
17 **SACRAMENTO DIVISION**

18 JOSHUA KUCHERKA,

19 Plaintiff,

20 v.

21 COMMISSIONER OF SOCIAL SECURITY,

22 Defendant.

23 Civil No. 2:24-cv-00385-AC

24 **STIPULATION AND ~~PROPOSED~~ ORDER**
25 **TO EXTEND BRIEFING SCHEDULE**

The parties stipulate through counsel that Defendant, the Commissioner of Social Security (the “Commissioner”), shall have an extension of 30 days to respond to Plaintiff’s Motion for Summary Judgment in this case. In support of this request, the Commissioner respectfully states as follows:

1. The Commissioner’s response to Plaintiff’s Motion for Summary Judgment is due June 10, 2024. Defendant has not previously received an extension of this deadline.

2. Counsel for the Commissioner is in the process of discussing the defensibility of this matter with his client. Counsel for the Commissioner believes that this short extension may resolve this matter without necessitating this Court to address the merits of this matter. Moreover, this brief extension would conserve judicial time and resources should the Parties be able to resolve this matter.

3. Counsel for the Commissioner has consulted with Plaintiff’s counsel who advised that he has no objections.

4. This request is made in good faith and is not intended to unnecessarily delay the proceedings in this matter.

WHEREFORE, Defendant requests until July 10, 2024, respond to Plaintiff’s Motion for Summary Judgment.

Date: June 7, 2024

UNITED DISABILITY LAW GROUP

By: /s/ Caspar Chan for Kevin Heitke*
KEVIN HEITKE
**Authorized by email on June 7, 2024*
Attorneys for Plaintiff

Date: June 7, 2024

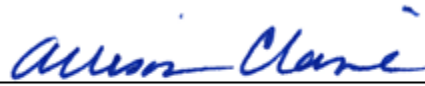
PHILIP A. TALBERT
United States Attorney
Eastern District of California

By: /s/ Caspar Chan
CASPAR CHAN
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED

DATED: June 7, 2024



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE